

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

JANUARY 15 2015
WILLIAM M. McCOOL, Clerk
[Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH ELOFSON-GILBERTSON,
MICHELLE DAVIS,
HENRY CROSS JR.,
JULIETTE CHARLES-ELOFSON,
and
JAKE BUTTERFIELD,

Defendants.

CR 15 NO 5010 RTB

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Distribution of Methamphetamine)

On or about August 31, 2011, in Clallam County, within the Western District of
Washington, KENNETH ELOFSON-GILBERTSON, MICHELLE DAVIS, and JAKE
BUTTERFIELD knowingly and intentionally did distribute, and did aid and abet the
distribution of, methamphetamine, a substance controlled under Schedule II, Title 21,
United States Code, Section 812.

Indictment/KENNETH ELOFSON-GILBERTSON, et al. - 1

UNITED STATES ATTORNEY
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TACOMA, WASHINGTON 98402
(253) 428-3800

1 All in violation of Title 21, United States Code, Sections 841(a)(1) and
2 841(b)(1)(C), and Title 18, United State Code, Section 2.

3 COUNT 2

4 (Distribution of Methamphetamine)

5 On or about November 15, 2012, in Clallam County, within the Western District
6 of Washington, MICHELLE DAVIS knowingly and intentionally did distribute, and did
7 aid and abet the distribution of, methamphetamine, a substance controlled under
8 Schedule II, Title 21, United States Code, Section 812.

9 All in violation of Title 21, United States Code, Sections 841(a)(1) and
10 841(b)(1)(C), and Title 18, United State Code, Section 2.

11 COUNT 3

12 (Distribution of Oxycodone)

13 On or about December 12, 2012, in Clallam County, within the Western District of
14 Washington, MICHELLE DAVIS and HENRY CROSS JR. knowingly and intentionally
15 did distribute, and did aid and abet the distribution of, oxycodone, a substance controlled
16 under Schedule II, Title 21, United States Code, Section 812.

17 All in violation of Title 21, United States Code, Sections 841(a)(1) and
18 841(b)(1)(C), and Title 18, United State Code, Section 2.

19 COUNT 4

20 (Distribution of Methamphetamine)

21 On or about December 19, 2012, in Clallam County, within the Western District of
22 Washington, MICHELLE DAVIS knowingly and intentionally did distribute, and did aid
23 and abet the distribution of, methamphetamine, a substance controlled under Schedule II,
24 Title 21, United States Code, Section 812.

25 All in violation of Title 21, United States Code, Sections 841(a)(1) and
26 841(b)(1)(C), and Title 18, United State Code, Section 2.

COUNT 5

(Distribution of Heroin)

On or about February 7, 2013, in Clallam County, within the Western District of Washington, HENRY CROSS JR. knowingly and intentionally did distribute, and did aid and abet the distribution of, heroin, a substance controlled under Schedule I, Title 21, United States Code, Section 812.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United State Code, Section 2.

COUNT 6

(Distribution of Heroin)

On or about February 13, 2013, in Clallam County, within the Western District of Washington, HENRY CROSS JR. and JULIETTE CHARLES-ELOFSON knowingly and intentionally did distribute, and did aid and abet the distribution of, heroin, a substance controlled under Schedule I, Title 21, United States Code, Section 812.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United State Code, Section 2.

COUNT 7

(Distribution of Heroin)

On or about February 20, 2013, in Clallam County, within the Western District of Washington, HENRY CROSS JR. and JULIETTE CHARLES-ELOFSON knowingly and intentionally did distribute, and did aid and abet the distribution of, heroin, a substance controlled under Schedule I, Title 21, United States Code, Section 812.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United State Code, Section 2.

COUNT 8

(Distribution of Heroin)

On or about March 6, 2013, in Clallam County, within the Western District of Washington, HENRY CROSS JR. knowingly and intentionally did distribute, and did aid

1 and abet the distribution of, heroin, a substance controlled under Schedule I, Title 21,
2 United States Code, Section 812.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(C), and Title 18, United State Code, Section 2.

5 COUNT 9

6 (Distribution of Heroin)

7 On or about March 13, 2013, in Clallam County, within the Western District of
8 Washington, KENNETH ELOFSON-GILBERTSON knowingly and intentionally did
9 distribute, and did aid and abet the distribution of, heroin, a substance controlled under
10 Schedule I, Title 21, United States Code, Section 812.

11 All in violation of Title 21, United States Code, Sections 841(a)(1) and
12 841(b)(1)(C), and Title 18, United State Code, Section 2.

13 COUNT 10

14 (Possession of Heroin with Intent to Distribute)

15 During July 2013, in Clallam County, within the Western District of Washington,
16 KENNETH ELOFSON-GILBERTSON, knowingly and intentionally did possess with
17 intent to distribute, and aid and abet the possession of with intent to distribute, heroin, a
18 substance controlled under Schedule I, Title 21, United States Code, Section 812.

19 All in violation of Title 21, United States Code, Sections 841(a)(1) and
20 841(b)(1)(C), and Title 18, United State Code, Section 2.

21 COUNT 11

22 (Possession of Methamphetamine with Intent to Distribute)

23 During July 2013, in Clallam County, within the Western District of Washington,
24 KENNETH ELOFSON-GILBERTSON knowingly and intentionally did possess with
25 intent to distribute, and aid and abet the possession of with intent to distribute,
26 methamphetamine, a substance controlled under Schedule II, Title 21, United States
27 Code, Section 812.

1 All in violation of Title 21, United States Code, Sections 841(a)(1) and
2 841(b)(1)(C), and Title 18, United State Code, Section 2.

3 COUNT 12

4 (Possession of Heroin with Intent to Distribute)

5 During March 2014, in Clallam County, within the Western District of
6 Washington, HENRY CROSS JR. and JULIETTE CHARLES-ELOFSON knowingly
7 and intentionally did possess with intent to distribute, and aid and abet the possession of
8 with intent to distribute, heroin, a substance controlled under Schedule I, Title 21, United
9 States Code, Section 812.

10 All in violation of Title 21, United States Code, Sections 841(a)(1) and
11 841(b)(1)(C), and Title 18, United State Code, Section 2.

12 COUNT 13

13 (Possession of Methamphetamine with Intent to Distribute)

14 During March 2014, in Clallam County, within the Western District of
15 Washington, HENRY CROSS JR. and JULIETTE CHARLES-ELOFSON knowingly
16 and intentionally did possess with intent to distribute, and aid and abet the possession of
17 with intent to distribute, methamphetamine, a substance controlled under Schedule II,
18 Title 21, United States Code, Section 812.

19 All in violation of Title 21, United States Code, Sections 841(a)(1) and
20 841(b)(1)(C), and Title 18, United State Code, Section 2.

21 NOTICE OF CRIMINAL FORFEITURE

22 Pursuant to Title 21, United States Code, Section 853, the Grand Jury alleges that
23 as a result of the felony offenses charged in Counts 1 through 13 above, punishable by
24 imprisonment for more than one year, each of the named defendants above shall forfeit to
25 the United States of America any and all interest in property, real or personal,
26 constituting, or derived from, any proceeds obtained, directly or indirectly, as the result
27 of said criminal offenses, and shall further forfeit any and all interest in property, used or
28

1 intended to be used, in any manner or part to commit, and to facilitate the commission of
2 such offense, including but not limited to the following assets:

- 3 1. \$10,425.00 in United States currency seized on July 6, 2013;
- 4 2. \$1,816.00 in United States currency seized on March 12, 2014;
- 5 3. One Ruger 10/22 carbine with Barska sight with serial number 123-14964, seized
6 on July 6, 2013;
- 7 4. One Ruger 10/22 carbine with Simmons brand scope with serial number 359-
8 05476, seized on July 6, 2013;
- 9 5. One Savage 110 Rifle with serial number F622398, seized on July 6, 2013;
- 10 6. HP laptop computer with serial number 5CB1435GNC, seized on July 6, 2013;
- 11 7. Apple laptop computer with serial number W8940M66E, seized on July 6, 2013;
- 12 8. HP laptop computer with serial number 2CE944JMP9, seized on July 6, 2013.

13 If any forfeitable property, as a result of any act or omission of these named
14 defendants cannot be located upon the exercise of due diligence, has been transferred or
15 sold to, or deposited with, a third person, has been placed beyond the jurisdiction of the
16 Court, has been substantially diminished in value, or has been commingled with other
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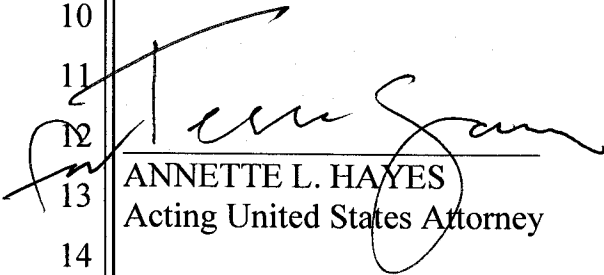
1 property which cannot be subdivided without difficulty, it is the intent of the United
2 States, pursuant to Title 21, United States Code, Section 853(p), to seek the forfeiture of
3 any property of the defendants up to the value of the forfeitable properties.
4

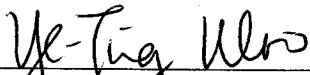
5 A TRUE BILL:

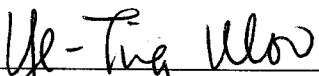
6 DATED: 15 January 2015
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8 *(Signature of Foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States)*

11 FOREPERSON

12 
13 ANNETTE L. HAYES
14 Acting United States Attorney

15 
16 TODD GREENBERG
17 Assistant United States Attorney

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19 YE-TING WOO
20 Assistant United States Attorney
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